

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	§	
	§	Chapter 11
	§	
J McCloud Realty LLC,	§	Case No. 25-11778-AMC
	§	
Debtor.	§	Related Docket No. 30
	§	

**MOTION FOR EXPEDITED CONSIDERATION OF MOTION OF THE
UNITED STATES TRUSTEE TO DISMISS DEBTOR’S CASE
OR CONVERT TO CHAPTER 7**

Andrew R. Vara, the United States Trustee for Region 3 (“U.S. Trustee”), by and through his undersigned counsel, hereby moves (this “Motion to Shorten”) for entry of an order, pursuant to Rule 9006(c) of the Federal Rules of Bankruptcy Procedure and L.B.R. 5070-1, expediting consideration of the *Motion Of The United States Trustee To Dismiss Debtor’s Case Or Convert To Chapter 7* (Docket No. 30) (the “Motion”).¹ In support of this Motion to Shorten, the U.S. Trustee states as follows:

BACKGROUND AND FACTS

1. On May 6, 2025 (the “Petition Date”), J McCloud Realty LLC (the “Debtor”) filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

2. On May 14, 2025, an initial hearing was held in this case on the *Motion to Prohibit Use of Cash Collateral and for Relief from Stay* (Docket No. 11) (the “Secured Creditor Motion”).

3. The continued hearing on the Secured Creditor Motion is scheduled for May 21, 2025.

4. On May 14, 2025, the U.S. Trustee filed the Motion, pursuant to which the U.S. Trustee seeks entry of an order dismissing the Debtor’s case or converting the case to chapter 7.

RELIEF REQUESTED

5. The U.S. Trustee seeks expedited consideration of the Motion pursuant to Rule 9006(c) of the Federal Rules of Bankruptcy Procedure and L.B.R. 5070-1.

6. Because estate assets may be at risk, the Motion must be resolved as expeditiously as possible. The U.S. Trustee therefore requests that the Motion be scheduled for the same date and time as the hearing on the Secured Creditor Motion.

7. Pursuant to Local Bankruptcy Rule 5070-1(g), the undersigned has communicated with the parties in interest, namely proposed counsel for the Debtor, the Subchapter V Trustee, and counsel to Philadelphia Federal Credit Union. None of the parties oppose the procedural relief requested through this Motion to Shorten.

8. Pursuant to L.B.R. 9014-2(a)(15), the Court may rule on this Motion to Shorten without the need for a hearing, and the U.S. Trustee requests that the Motion to Shorten be granted without further hearing.

CONCLUSION

WHEREFORE, the U.S. Trustee respectfully requests that the Court enter an order granting the relief requested herein and grant such other and further relief as the Court deems just and proper.

Dated: May 14, 2025

Respectfully submitted,

ANDREW R. VARA
UNITED STATES TRUSTEE
For Regions 3 and 9

By: /s/ John Schanne

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